

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

HORIZON BLUE CROSS BLUE
SHIELD OF NEW JERSEY,

Plaintiff,

v.

SPEECH & LANGUAGE CENTER,
LLC; CHRYSSOULA MARINOS-
ARSENIS; JOHN DOES 1-10 and
ABC CORPORATIONS 1-10,

Defendants.

CIVIL ACTION NO.:
3:22-cv-01748-MAS-DEA

**NOTICE OF MOTION TO
REMAND**

TO: Chryssoula Arsenis
c/o Speech and Language Center LLC
65 Mountain Blvd. Unit 207
Warren, NJ 07059

Chryssoula Arsenis
6 Quail Run
Warren, NJ 07059

PLEASE TAKE NOTICE that on June 6, 2022, at 9:00 a.m., or as soon thereafter as counsel may be heard, Plaintiff Horizon Blue Cross Blue Shield of New Jersey, by its undersigned counsel, shall move before the Honorable Michael A. Shipp, U.S.D.J., pursuant to 28 U.S.C. § 1447(c) to remand this action to the Superior Court of New Jersey, Somerset County, Law Division.

In support of this motion, Horizon shall rely on the attached Memorandum of Law and Certification of Counsel with exhibits.

A proposed form of Order is submitted herewith.

CONNELL FOLEY LLP

Attorneys for Plaintiff

*Horizon Blue Cross Blue Shield of New
Jersey*

By: /s/ Patricia A. Lee

Patricia A. Lee, Esq.

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DATE: April 26, 2022